

revocation of long distance authority under section 271(d)(6)(A). And it already has made clear that it will not hesitate to invoke that authority.

C. Verizon's Entry Will Increase Long Distance Competition.

It is by now unassailable that "BOC entry into the long distance market will benefit consumers and competition." Pennsylvania Order ¶ 125; accord Massachusetts Order ¶ 234. Indeed, consumer groups have documented these benefits, concluding that consumers in New York who switched to Verizon long distance are saving up to \$284 million annually⁹³ and that Verizon's entry in New York has enabled consumers in that state to obtain rate reductions of 20 percent for local and long distance services.⁹⁴ Another recent study, by MIT Professor Jerry Hausman, concludes that, in the first year after a BOC enters the long distance market, consumers in that state experience long distance savings of 10 to 20 percent.⁹⁵ Yet, while Verizon and other BOCs are offering customers lower rates, the long distance incumbents have raised their basic rates yet again. Consumers Action recently found that, "[s]ince last year, basic rates at AT&T and MCI-WorldCom increased during evening and weekends by up to 13%," and AT&T, WorldCom, and Sprint "have significantly increased charges, surcharges and fees in other areas."⁹⁶ Moreover, all three long distance incumbents have just recently raised their rates

⁹³ Telecommunications Research & Action Center (TRAC), 15 Months After 271 Relief: A Study of Telephone Competition in New York at 1 (Apr. 25, 2001) (App. L, Tab 5).

⁹⁴ See Consumer Fed'n of Am. & Consumers Union, Lessons from 1996 Telecommunications Act: Deregulation Before Meaningful Competition Spells Consumer Disaster 9-10 (Feb. 2001).

⁹⁵ See Hausman, supra note 73.

⁹⁶ Consumer Action, Long Distance Rates Survey 2001, Consumer Action News, Fall 2001, at http://www.consumer-action.org/Library/English/Newsletter/NL-I-23_EN/NL-I-23_EN.html; see also Kalpana Srinivasan, Long-Distance Giant Boosts Rate for Millions of Customers, Associated Press, June 2, 2001 ("Nearly half of AT&T's long-distance customers will see their bills go up next month, as the nation's biggest carrier raises its per-minute rates for

yet again, with increases as high as 10 to 20 percent.⁹⁷

Verizon's entry will undoubtedly have the same pro-competitive effects in Vermont that it has in other states because Verizon will offer the same attractive long distance plans, which are simpler and less expensive than most other carriers'.⁹⁸ Verizon's calling plans have been particularly attractive for the low-volume customers that the long distance incumbents historically have tried to discard or ignore.⁹⁹ For example, not only does Verizon offer a number of plans with no monthly minimum and no calling plan fee, but it also automatically enrolls all of its customers in a calling plan (known as the Timeless plan) that has no minimum usage requirement or monthly plan fee if they fail to choose a plan. The Timeless plan is particularly attractive for low-volume users because it offers a flat, low rate of 10 cents per minute for interstate calls with no monthly calling plan fees or minimum usage fees. In contrast, the long distance incumbents require customers who do not enroll in a plan to pay relatively higher "basic" rates, or they put those customers in default plans with rates considerably higher than

basic plans. . . . 'Obviously we don't have a lot of competitive forces at work in the long-distance business to pressure AT&T.'") (quoting Gene Kimmelman of Consumers Union).

⁹⁷ Wayne Kawamoto, Qwest Criticizes AT&T Over Rates, clec-planet.com (Jan. 10, 2002), at <http://www.clec-planet.com/news/01jan2002/1qwest.html> ("AT&T, WorldCom and Sprint recently announced increases of 10 to 20 percent on their basic rate plans."); AT&T, Rates, Terms and Conditions, Advance Notice of Price Increase (Dec. 14, 2001), at <http://www.serviceguide.att.com/ACS/ext/Documents.cfm?DID=5043>; MCI, Recent Rate, GSA, and Calling Service Updates, at http://www.mci.com/mci_service_agreement/res_most_recent_info.jsp; Sprint Corp., Recent Changes to Sprint Rates, Terms and Conditions, at <http://csg.sprint.com/ratesandconditions/documents/resratechanges.pdf>.

⁹⁸ Moreover, Verizon's real-world experience in New York puts to rest once and for all the claims that the long distance incumbents have rehashed for more than 15 years — based on nothing more than far-fetched theories and hyperbole — that Bell company entry into long distance would have adverse competitive effects. The Commission has already determined that such claims have no place in the review of a section 271 application. See New York Order ¶ 428; see also Texas Order ¶ 419.

⁹⁹ See, e.g., Low-Volume Long-Distance Users, Notice of Inquiry, 15 FCC Rcd 6298 (1999).

their most popular calling plans. And, even when the long distance incumbents do offer a flat-rate plan (i.e., with no monthly plan fee or minimum usage fee) that might otherwise be attractive to low-volume users, their rates typically are substantially higher than those offered by Verizon. For example, AT&T's cheapest flat-rate plan with no monthly fee is its "AT&T One Rate Basic," which, after a recent AT&T rate increase, now offers a flat-rate of 19.5 cents per minute — 95 percent more expensive than Verizon's Timeless plan.¹⁰⁰ Indeed, AT&T has recently acknowledged that "RBOCs consistently appeal to lower-end customers."¹⁰¹

Both in anticipation of and in response to Verizon's entry into the long distance market, the incumbent long distance carriers have been forced to introduce special, lower-priced bundled services offerings to customers. For example, in New York, WorldCom rolled out a new "One Company Advantage" plan under which its customers receive unlimited local and long distance calls for 7 cents per minute, plus 200 free minutes of long distance calling.¹⁰² In contrast, its flagship national plan charges nearly 14 cents per minute for in-state long distance.¹⁰³ Likewise, AT&T introduced its "AT&T Local One Rate New York" package, which includes reduced rates of 7 cents per minute for interstate calls and 10 cents per minute for in-state calls, and which drops the monthly fee associated with AT&T's most comparable national plan.¹⁰⁴

¹⁰⁰ See AT&T, Rates, Terms and Conditions, Advance Notice of Price Increase, at <http://www.serviceguide.att.com/ACS/ext/Documents.cfm?DID=5166>.

¹⁰¹ Betsy Bernard, President and CEO, AT&T Consumer, AT&T Consumer, Jan. 7, 2002, at http://www.att.com/ir/ae/2001ssb/20020107_bernard.pdf.

¹⁰² See WorldCom, Local Choice: New York, at http://www.mci.com/home_family/products_services/local/ny/choice.shtml.

¹⁰³ See WorldCom, Local Toll and In-State Long Distance Calling for Your Home, at http://www.mci.com/home_family/products_services/local_toll/index.jsp.

¹⁰⁴ See AT&T, AT&T Local One Rate New York, at http://www.local.att.com/LocalOneRate_M.jhtml.

In Massachusetts and Pennsylvania, AT&T responded to Verizon's entry by providing its customers in those states with 30 free minutes of long distance calling.¹⁰⁵ AT&T made consumers aware of this promotion through a special greeting that plays when the customer makes a long distance call.¹⁰⁶ Massachusetts and Pennsylvania were the only states in Verizon's region in which AT&T has made this promotional offer available, which follows a similar promotion that AT&T made to its customers in Kansas and Oklahoma just two days before SBC was authorized to provide long distance service in those states.¹⁰⁷ AT&T has since made the same offer to its customers in Missouri and Arkansas shortly before the Commission authorized SBC to provide long distance in those states.¹⁰⁸

As this experience makes clear, Verizon's entry not only has promoted additional local competition, but it also has produced substantial competitive benefits for long distance and bundled services packages. Consumers in Vermont are now entitled to the same benefits.

¹⁰⁵ See AT&T Press Release, Bay State AT&T Long Distance Customers Get the Message: Thanks for Your Loyalty (May 14, 2001) ("AT&T May 14 Press Release"); see also AT&T Press Release, AT&T to Keystone State Long Distance Customers: Thanks for Your Loyalty (Aug. 14, 2001) ("AT&T August 14 Press Release").

¹⁰⁶ See AT&T May 14 Press Release; AT&T August 14 Press Release. Moreover, AT&T extended its offer to Massachusetts despite having stated, just weeks earlier, that it had "no immediate plans to extend [the] program to other states." Comm. Daily, Mar. 8, 2001, at 9.

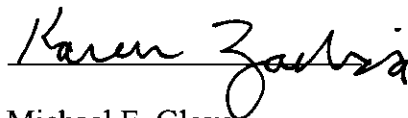
¹⁰⁷ See AT&T Press Release, AT&T Long Distance Customers in Kansas Get the Message: Thanks for Your Loyalty (Mar. 5, 2001); see also AT&T Press Release, AT&T Long Distance Customers in Oklahoma Get the Message: Thanks for Your Loyalty (Mar. 5, 2001).

¹⁰⁸ See AT&T Press Release, AT&T to Missouri Customers: Show Me the Minutes (Oct. 22, 2001); see also AT&T Press Release, AT&T Long Distance Customers in Arkansas Get the Message: Thanks for Your Loyalty (Oct. 22, 2001).

CONCLUSION

Verizon's Application to provide interLATA service originating in Vermont should be granted.

Respectfully submitted,



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A

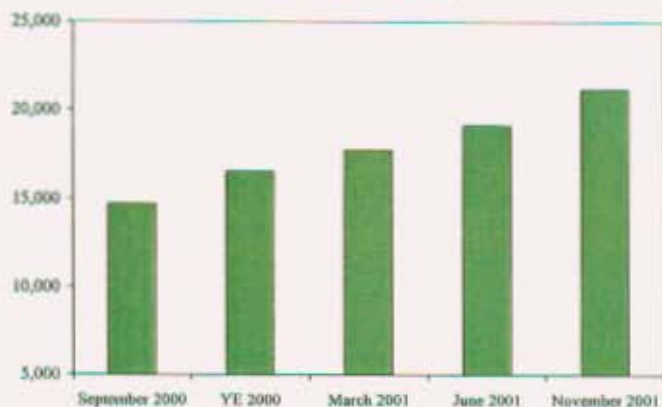
Exhibit 1. Verizon's Checklist Compliance Under the 1996 Act

§ 271 Checklist

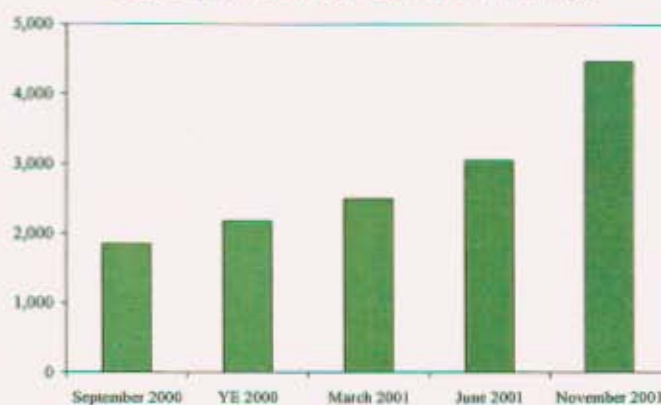
1. Interconnection	⇒	Approximately 15,000 trunks Approximately 26 collocation arrangements in service Approximately 4,800 facilities-based CLEC lines
2. Unbundled Network Elements	⇒	More than 1,500 unbundled loops Approximately 790 unbundled switching ports
3. Poles, Ducts, Conduits, and Rights of Way	⇒	Approximately 7,700 feet of conduit to 4 communications carriers and 1 other company Approximately 97,000 pole attachments to 15 communications carriers and 26 other companies
4. Local Loops	⇒	More than 1,500 total loops, including approximately 750 stand-alone loops plus approximately 790 loops provided as part of platforms
5. Transport	⇒	Approximately 40 unbundled dedicated local transport facilities Approximately 790 shared transport arrangements 5 orders for dark fiber
6. Switching	⇒	Approximately 790 unbundled switching ports
7. 911/E911/DA/Operator Services	⇒	2 CLECs purchasing OS via approximately 60 dedicated trunks 2 CLECs purchasing DA via approximately 60 dedicated trunks 3 CLECs purchasing 911/E911 via approximately 28 dedicated trunks
8. White Pages	⇒	More than 8,500 CLEC listings (including resale)
9. Numbering Administration	⇒	Approximately 2.3 million telephone numbers
10. Databases/Signaling	⇒	1 CLEC with access to signaling network 8 CLECs using Calling Name Database 3 CLECs/IXCs using Local Number Portability Database
11. Number Portability	⇒	Approximately 18,000 numbers ported via LNP
12. Dialing Parity	⇒	Local dialing parity available throughout Vermont
13. Reciprocal Compensation	⇒	3 CLECs, 3 CMRS providers, 1 paging carrier
14. Resale	⇒	Approximately 15,900 resold lines, including approximately 340 residential lines and approximately 15,600 business lines

Exhibit 2. Local Competition in Vermont

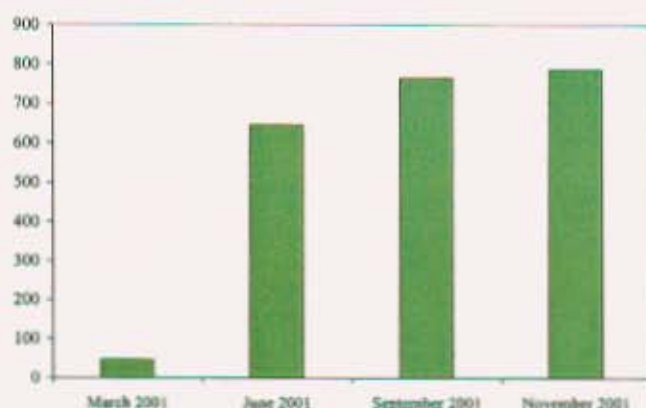
Total CLEC Lines



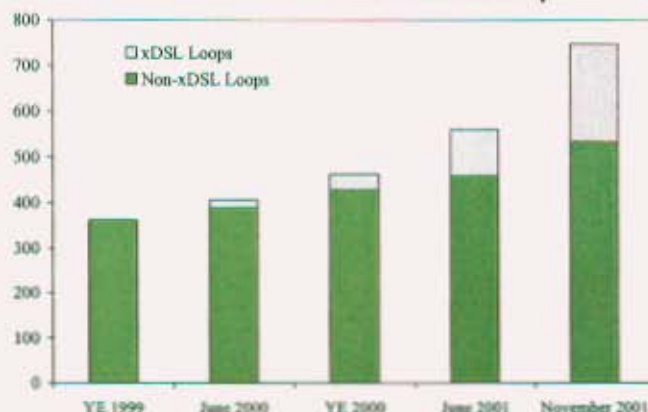
CLEC Facilities-Based Lines (E911 Listings)



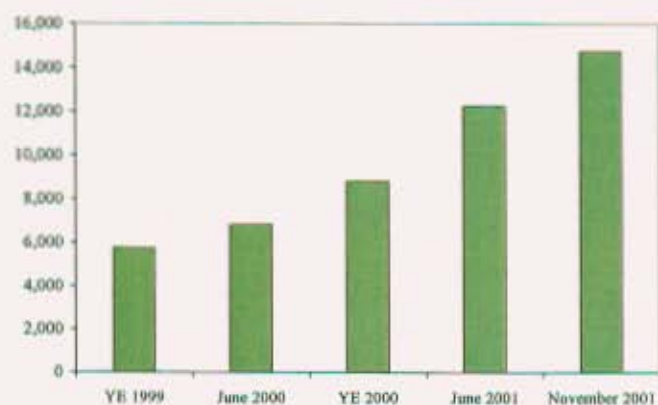
CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Interconnection Trunks



CLEC Ported Numbers

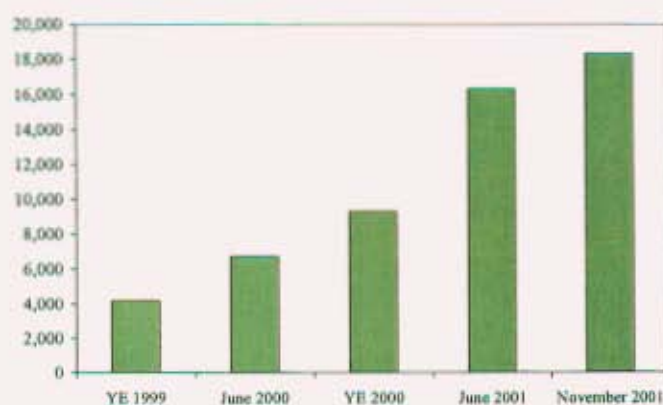
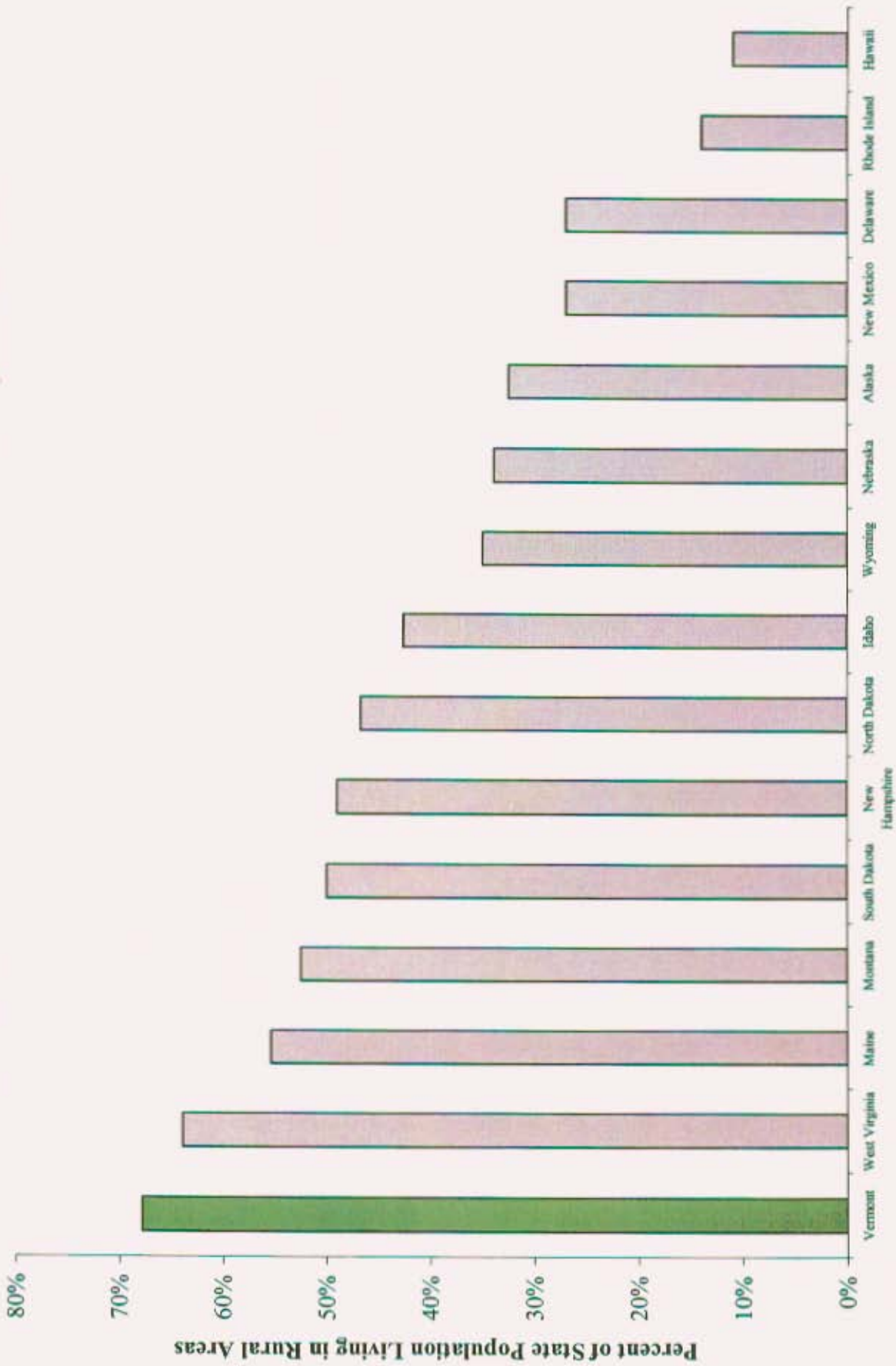


Exhibit 3. Of the 15 Least Populous States, Vermont Has the Fewest Inhabitants Living in Cities



Source: United States Census Bureau, *Census 2000 Redistricting Data*, <http://www.census.gov/clo/www/redistricting.html>.

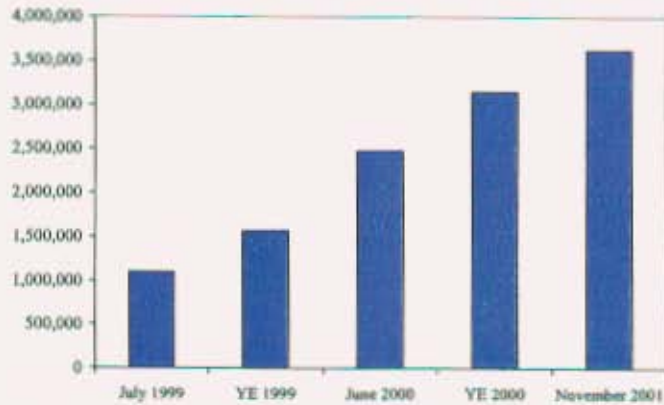
Exhibit 4. Rural Population of the 15 Least Populous States



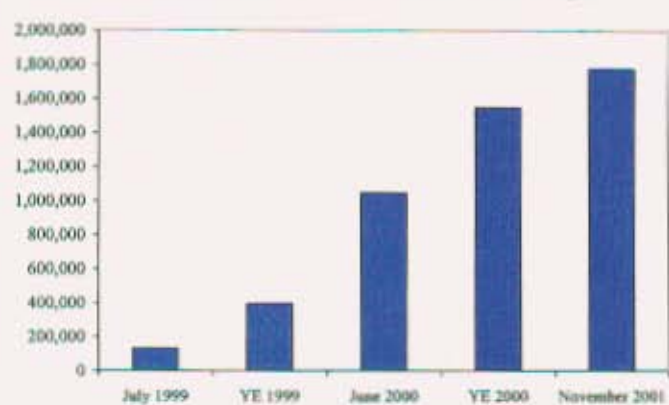
Source: United States Census Bureau, *Urban and Rural Population: 1900 to 1990* (rel. Oct. 1995), <http://www.census.gov/population/censusdata/urpop0090.txt>.

Exhibit 5. Growth of Local Competition in New York (§ 271 Authorization Granted December 1999)

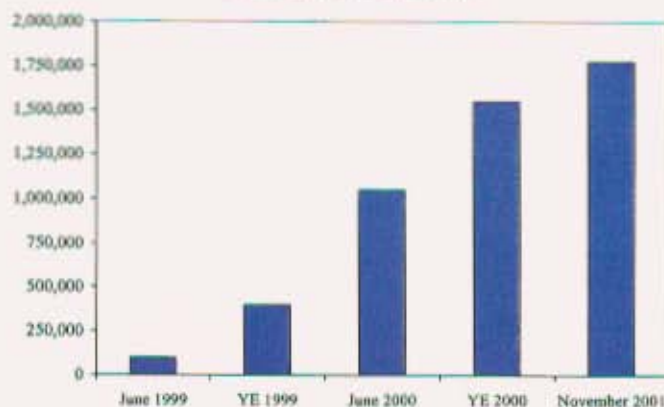
Total CLEC Lines



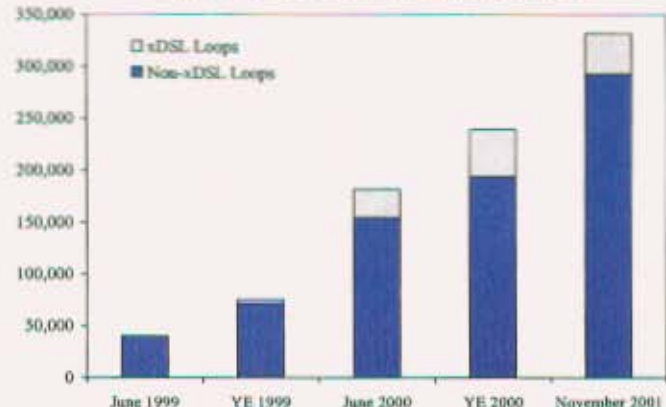
CLEC Facilities-Based Lines (E911 Listings)



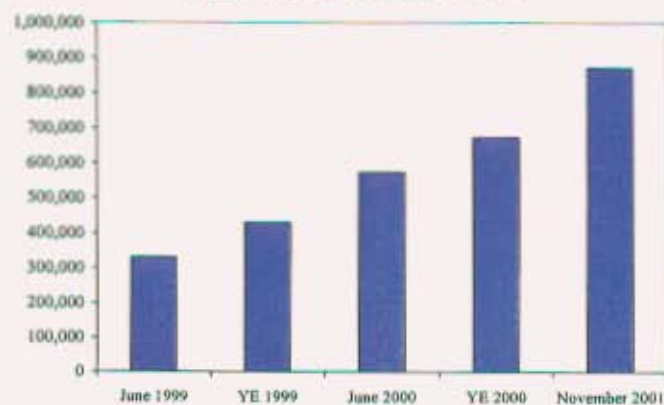
CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Interconnection Trunks



CLEC Ported Numbers

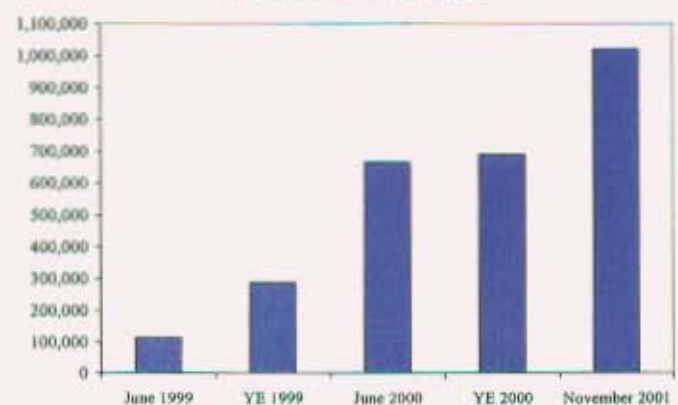
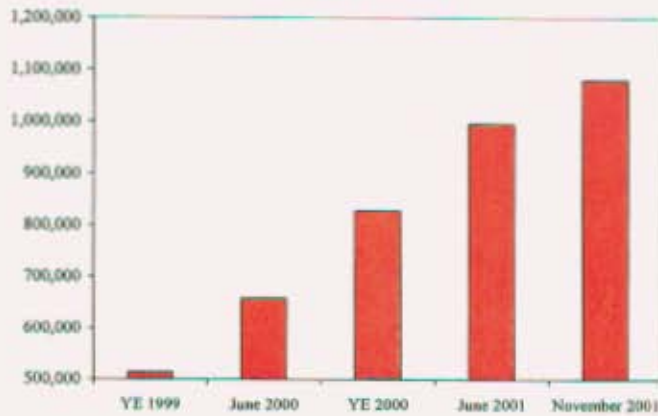
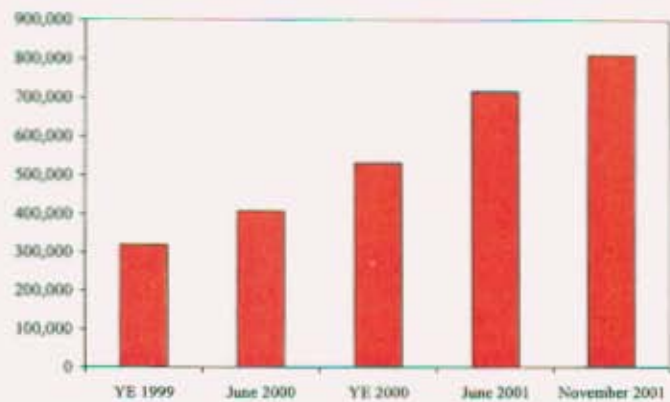


Exhibit 6. Growth of Local Competition in Massachusetts (§ 271 Authorization Granted April 2001)

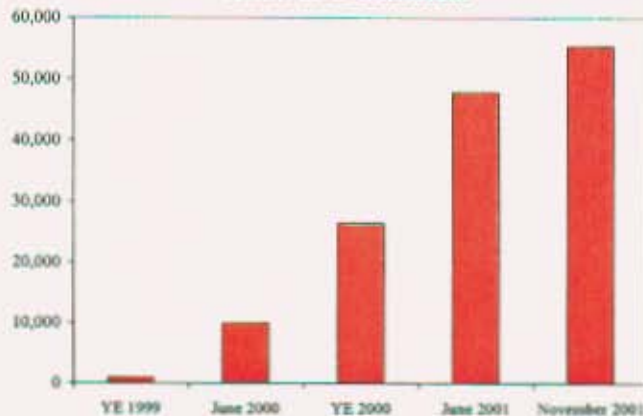
Total CLEC Lines



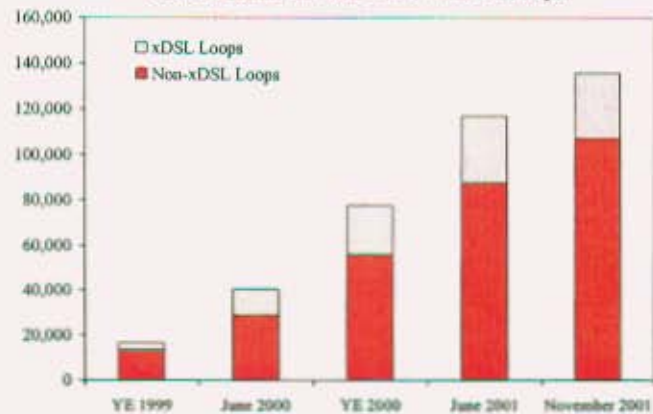
CLEC Facilities-Based Lines (E911 Listings)



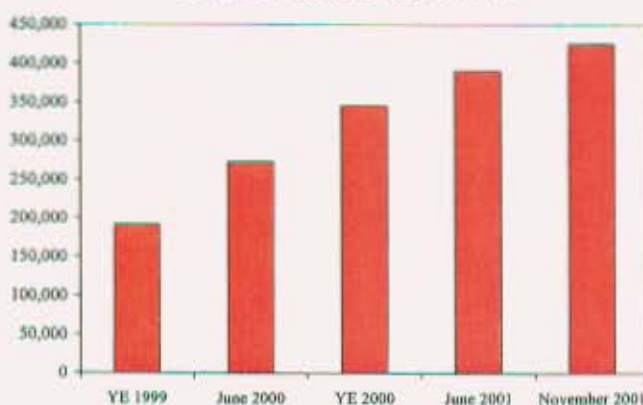
CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Interconnection Trunks



CLEC Ported Numbers

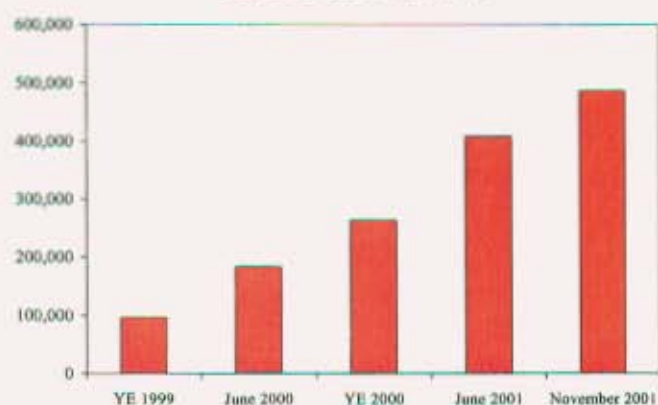
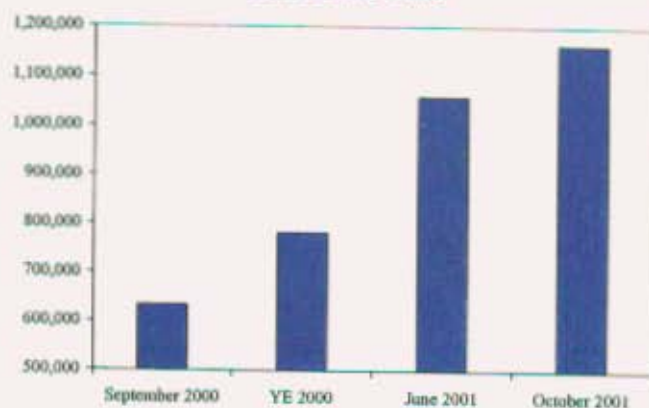
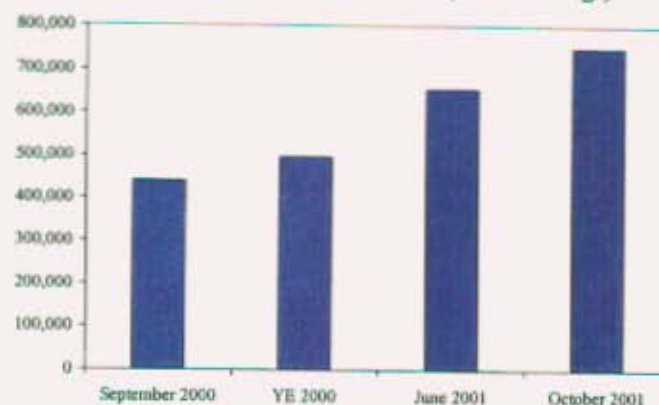


Exhibit 7. Growth of Local Competition in Pennsylvania (§ 271 Authorization Granted September 2001)

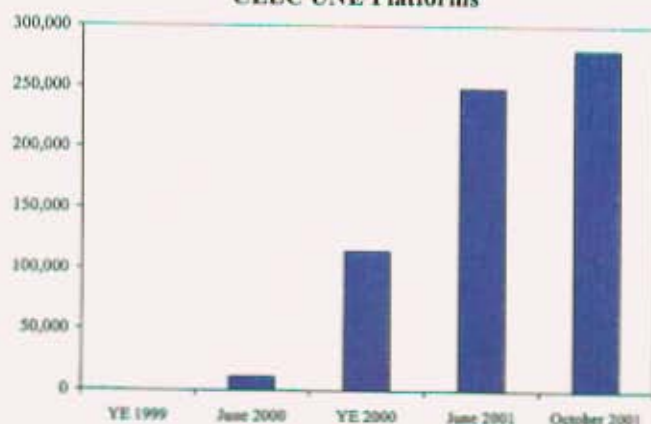
Total CLEC Lines



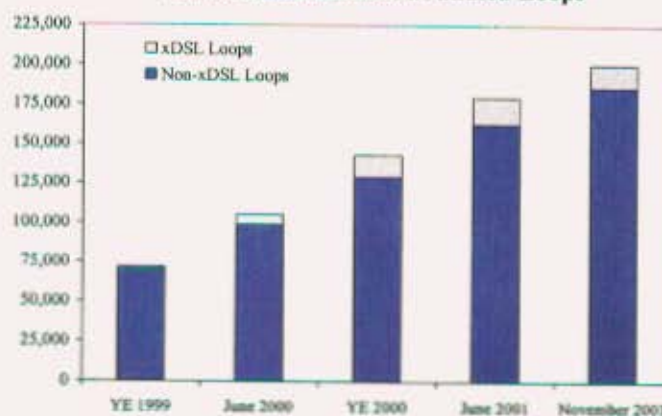
CLEC Facilities-Based Lines (E911 Listings)



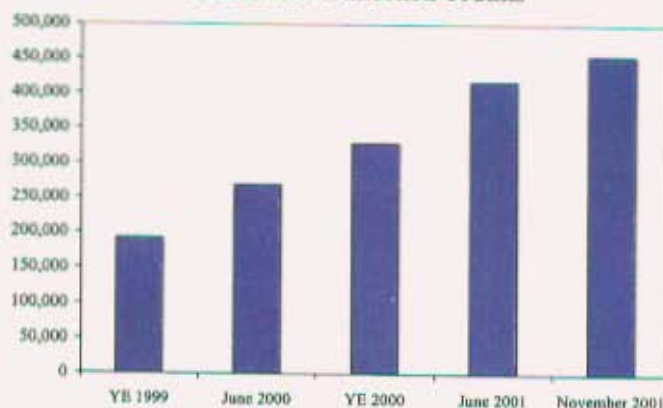
CLEC UNE Platforms



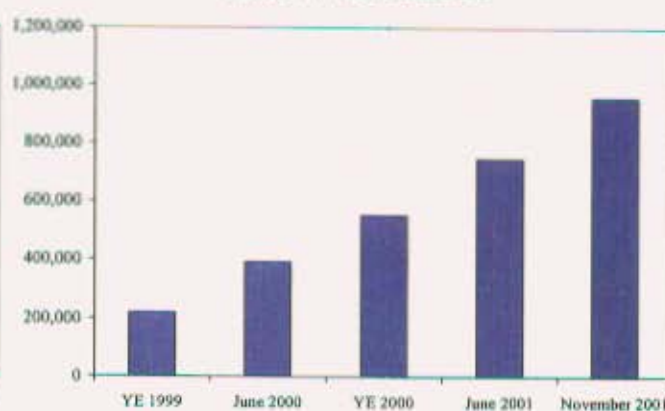
CLEC Stand-Alone Unbundled Loops



CLEC Interconnection Trunks



CLEC Ported Numbers



B

Required Statements

Pursuant to the Commission's March 23, 2001 Public Notice entitled Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (rel. March 23, 2001), Verizon states as follows:

- (a) pages i-iv of this Brief contain a table of contents;
- (b) pages 1-5 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 6-12 of this Brief contain a statement identifying how Verizon meets the requirements of section 271(c)(1), including a list of the specific agreements on which Verizon bases its application; page 13 n.16 of this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 14-15, 80-82 of this Brief contain a statement summarizing the status of the Vermont Public Service Board's proceeding examining Verizon's compliance with section 271;
- (e) this Brief contains all legal and factual arguments that the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 13-69 address the requirements of section 271(d)(3)(A); pages 69-73 address the requirements of section 271(d)(3)(B); and pages 74-98 address the requirements of section 271(d)(3)(C);
- (f) pages iii-iv of and Attachment C to this Brief contain a list of all appendices (including declarations) and the location of and subjects covered by each of those appendices has been included;
- (g) inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by Verizon in this application should be addressed to: Steven McPherson, Verizon, 1515 North Court House Road, Suite 500, Arlington, Virginia 22201, (703) 351-3083;
- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 are appended hereto;
- (i) certifications signed by an officer or duly authorized employee certifying that all information supplied in this application is true and accurate to the best of his or her information and belief are appended hereto.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Vermont)

**DECLARATION AND VERIFICATION OF V. LOUISE MCCARREN
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF VERIZON VERMONT.**

1. I, Louise McCarren, am President of Verizon Vermont. I am authorized to make this declaration on behalf of Verizon Vermont.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Vermont, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Vermont is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on January 15, 2002.




V. Louise McCarren

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Vermont)

**DECLARATION AND VERIFICATION OF JOHN HAVENS
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF BELL ATLANTIC COMMUNICATIONS, INC. (d/b/a VERIZON LONG
DISTANCE)**

1. I, John Havens, am President and Chief Executive Officer of Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance). I am authorized to make this declaration on behalf of Bell Atlantic Communications, Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Vermont, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that of Bell Atlantic Communications, Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on January 5, 2002.



John Havens

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Vermont)

**DECLARATION AND VERIFICATION OF JOHN HAVENS
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
NYNEX LONG DISTANCE COMPANY (d/b/a VERIZON ENTERPRISE SOLUTIONS)**

1. I, John Havens, am President and Chief Executive Officer of NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions). I am authorized to make this declaration on behalf NYNEX Long Distance Company.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Vermont, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that NYNEX Long Distance Company is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on January 15, 2002.



John Havens

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Vermont)

**DECLARATION AND VERIFICATION OF FRED R. HOWARD
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF VERIZON GLOBAL NETWORKS INC.**

1. I, Fred R. Howard, am Executive Director of Verizon Global Networks Inc. I am authorized to make this declaration on behalf of Verizon Global Networks Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Vermont, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Global Networks Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on January 15, 2002.


Fred R. Howard

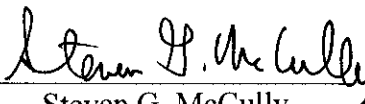
Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX)
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Vermont)

CC Docket No. _____

**DECLARATION AND VERIFICATION OF STEVEN G. MCCULLY
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF VERIZON SELECT SERVICES INC.**

1. I, Steven G. McCully, am President - Enterprise Long Distance of Verizon Select Services Inc. I am authorized to make this declaration on behalf of Verizon Select Services Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Vermont, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Select Services Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on January 15, 2002.


Steven G. McCully

**APPLICATION BY VERIZON NEW ENGLAND
FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN VERMONT**

BRIEF ATTACHMENT C

DETAILED INDEX OF APPENDICES

Table of Contents to the Index

Appendix A	1
Declarations	
Appendix B	2
Selected Portions of the Record of Vermont Public Service Board Docket No. 5936 (Investigation into Entry of New England Telephone and Telegraph Company d/b/a NYNEX into InterLATA Services under Section 271 of the Telecommunications Act of 1996)	
Appendix C	2
Selected Portions of the Record of Vermont Public Service Board Docket No. 6533 (Application of Verizon New England Inc. d/b/a Verizon Vermont for a Favorable Recommendation To Offer InterLATA Services Under 47 U.S.C. 271)	
Appendix D	3
Third Party Testing Material	
Appendix E	3
Selected Portions of the Record of Vermont Public Service Board Docket No. 5713 (Investigation into New England Telephone and Telegraph Company's (NET's) Tariff Filing re: Open Network Architecture, Including the Unbundling of NET's Network, Expanded Interconnection and Intelligent Networks)	
Appendix F	4
Selected Portions of the Record of Vermont Public Service Board Docket No. 6553 (Investigation into Tariff Filing of Verizon New England Inc., d/b/a Verizon Vermont, Re: Revisions to its Pole Attachments Tariff)	

Appendix G	4
Selected Portions of the Record of Vermont Public Service Board Docket No. 5900 (Joint Petition of New England Telephone & Telegraph Company d/b/a NYNEX, NYNEX Corporation, and Bell Atlantic Corporation for Approval of a Merger of a Wholly-Owned Subsidiary of Bell Atlantic Corporation into NYNEX Corporation)	
Appendix H	5
Selected Portions of the Record of Vermont Public Service Board Docket No. 6318 (Investigation of Geographically Deaveraged Unbundled Network Prices)	
Appendix I	5
Selected Portions of the Record of Vermont Public Service Board Docket No. 6255 (Investigation into the Establishment of Wholesale Service Quality Standards for Providers of Telecommunications Services)	
Appendix J	5
Selected Interconnection Agreements and Statement of Generally Available Terms and Conditions	
Appendix K	6
Selected 272 Documents	
Appendix L	6
Additional Selected Documents	
Appendix M	7
CLEC-Specific Carrier-to-Carrier Reports, Trend Reports and Summary Measurements Reports	

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APPENDIX A

Declarations

Tab	Declarant	Subject
A	Paul A. Lacouture and Virginia P. Ruesterholz	Competitive Checklist
B	Kathleen McLean and Raymond Wierzbicki	Operations Support Systems
C	Elaine M. Guerard, Julie A. Canny, and Beth A. Abesamis	Performance Measurements
D	V. Louise McCarren, Patrick A. Garzillo, and Michael J. Anglin	Pricing
E	Susan C. Browning	Section 272 Compliance
F	Paula L. Brown	Local Competition

APPENDIX B

**Selected Portions of the Record of Vermont Public Service Board
Docket No. 5936
(Investigation into Entry of New England Telephone and Telegraph Company
d/b/a NYNEX into InterLATA Services under Section 271 of the
Telecommunications Act of 1996)**

Volume	Tab	Date	Description
1	1	07/07/97	PSB's Second Procedural Order
1	2	01/03/01	PSB's Report and Recommendation and Final Order Closing Docket

APPENDIX C

**Selected Portions of the Record of Vermont Public Service Board
Docket No. 6533
(Application of Verizon New England Inc. d/b/a Verizon Vermont for a
Favorable Recommendation To Offer InterLATA Services
Under 47 U.S.C. 271)**

Volume	Tab	Date	Description
1a-f	1	08/07/01	Verizon VT's Section 271 Filing (including Declarations and Attachments)
2a-b	2	09/24/01	Verizon VT's Responses to PSB's Data Request No. PSB 1; DPS's Data Requests Nos. DPS 1-1 Through DPS 1-101, DPS 103 Through DPS 132, DPS 134 Through DPS 1-139, and DPS 141 Through 1-146; CTC's Data Requests Nos. 1-1 Through 1-77; and WorldCom's Data Requests Nos. WCOM 1-1 Through WCOM 1-6 (Redacted Version)
3	3	09/25/01	Verizon VT's Responses to DPS's Data Requests Nos. DPS 1-102, DPS 1-133, and DPS 1-140 and Supplemental Response to DPS 1-93 (Redacted Version)
3	4	10/05/01	Verizon VT's Supplemental Response to DPS's Data Request No. DPS 1-106 (Redacted Version)
3	5	10/09/01	Verizon VT's Responses to DPS's Data Requests Nos. DPS 2-1 Through DPS 2-28, Errata Response to DPS 1-5, and Supplemental Responses to DPS 1-88 and DPS 1-89 (Redacted Version)
3	6	11/07/01	Verizon VT's Supplemental Response to DPS's Data Request No. DPS 1-86
3	7	11/09/01	Verizon VT's Supplemental Measurements Declaration and Supplemental Checklist Declaration and Attachments (Redacted Version)
3	8	11/16/01	Verizon VT's Supplemental OSS Declaration
3	9	11/28/01	Transcript of Hearing Held on 11/28/01 (Redacted Version)
4	10	11/29/01	Transcript of Hearing Held on 11/29/01